UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA

No. 23 CR 54

v.

Judge Mary M. Rowland

DAVID LIRA

JOINT STATUS REPORT

The UNITED STATES OF AMERICA, by and through its attorney, ANDREW S. BOUTROS, United States Attorney for the Northern District of Illinois, and the defendant, DAVID LIRA, individually and through his attorneys, DAMON CHERONIS, CHRISTOPHER PARENTE, and RYAN LEVITT, provide this joint status report as directed by the Court in the Order entered on May 23, 2025 (Dkt. No. 134.)

- 1. On December 23, 2024, the Court set a deadline for motions *in limine* ordering any such motions to be filed by June 12, 2025 and any responses due by June 20, 2025. Dkt. No. 99. The Court also ordered that the parties file a joint pretrial statement be filed on June 12, 2025. *Id*.
- 2. The parties would like to keep the current deadlines for motions *in limine* in place, with any such motions to be filed by June 12, 2025 and any responses filed by June 20, 2025. The parties are currently collaboratively working on the joint pretrial statement. The government has provided to the defense copies of its proposed exhibits, stipulations, witness list, jury instructions, voir dire, and statement of the case.

- 3. At this time, the government does not anticipate filing any additional motions *in limine*, although that could change based on the defense's position on its proposed exhibit list and stipulations. The defense has at least one additional motion *in limine*.
- 4. The parties will continue to work together to meet and confer beforehand and to provide the Court with enough time to review any future filings.

 Dated: May 28, 2025

Respectfully submitted,

FOR the UNITED STATES OF AMERICA For DAVID LIRA

ANDREW S. BOUTROS United States Attorney

BY: s/ Jared Hasten

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